



**FSTG**

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**FAA NPRM AC 25.853-3X  
INDUSTRY COMMENTS**

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# Update of PS-ANM-25.853-01-R2 to AC 25.853-3X

- Since the Policy Statement ([PS-ANM-25.853-01-R2](#)) release, there have been questions regarding the interpretation of the policy and requests for additional Methods of Compliance.
- The Flammability Standardization Task Group (FSTG) has been working across industry to provide input to the FAA and other regulators on updates to the MOCs prior to release of the NPRM.

# Update of PS-ANM-25.853-01-R2 to AC 25.853-3X (Cont.)

- The FSTG held biweekly meetings and a two day face to face meeting after the NPRM was released, to compare AC 25.853-3X to all the inputs provided by the FSTG to the FAA prior to the NPRM.
- The FSTG then provided comments on the NPRM based on the differences and proposed new MOCs as well.

# Comments to NPRM AC25.853-3X

25.853-3X Title	What is the FAA's proposed requirement or text?	Comment (Why the item should change)	Requested Change (How the item should read)
Purpose	<p>This AC provides guidance for an acceptable means of showing compliance with the part 25 requirements for flammability testing of commonly constructed parts, construction details, and materials used on transport category airplanes. The MOCs described in this AC apply when either Bunsen burner or heat release testing is used to demonstrate compliance with the requirements in § 25.853. The MOCs discussed in this AC apply to § 25.853(a), amendment 25-32 through amendment 25-116; § 25.853(d) prior to amendment 25-XXX; and § 25.853(c)(1)(i), (d)(1), and (d)(2), amendment 25-XXX. In addition, where the same test methods are used to meet other testing requirements, such as special conditions or § 25.855, the MOCs in this AC also apply.</p>	<p>Smoke applicability for previous amendments should be added to clarify that the MOCs applicable to heat release are applicable to smoke test methods for past amendment levels. The guidance in this AC is applicable to all FAA regulations with the same flammability test methods and should be added to the Purpose section for clarity (if this is allowed by the FAA across regulations). Many of the Methods of Compliance in this AC are also applicable to the 45 degree bunsen burner test and this regulation should be added to the purpose. Data has shown wire color has no effect on results and the color MOC should apply to wire.</p>	<p>This AC provides guidance for an acceptable means of showing compliance with the part 25 requirements for flammability testing of commonly constructed parts, construction details, and materials used on transport category airplanes. The MOCs described in this AC apply when either Bunsen burner or heat release testing (and smoke generation test for previous amendments) is used to demonstrate compliance with the requirements in § 25.853. The MOCs discussed in this AC apply to § 25.853(a), amendment 25-32 through amendment 25-116; § 25.853(d) prior to amendment 25-XXX; 25.853 (h) (see Table 2X) and 25.869(a)(4) through amendment 116; 25.1713 (c) and § 25.853(c)(1)(i), 25.853(c)(1)(ii), 25.853(c)(2)(iv), (d)(1), and (d)(2), amendment 25-XXX. In addition, where the same test methods are used to meet other testing requirements, such as special conditions or § 25.855, and other regulations with the same test methods (such as Parts 23 [23.853, 23.855], 27 [27.1365], 29 [29.853, 29.1359] and 121 [121.312]) the MOCs in this AC also apply.</p>



Questions?

